

Danner, Ward

From: Armann, Steve
Sent: Wednesday, June 18, 2014 7:11 AM
To: Jennifer DENICOLA
Cc: Scott, Jeff; Huetteman, Tom
Subject: Concurrence on District's Sampling Plan

Jennifer, Last night Jeff asked me to follow up with you regarding the status of the required cleanup plan and the recently "approved" sampling plan. Below, I've outlined where we are with the District. Please call if you have any questions or we can talk on Friday. Thanks.

- On June 4, 2014 we submitted comments to the District on their General Plan (Plan) to address PCBs at schools within the Santa Monica Malibu Unified School District. The transmittal letter to the Plan outlined how the District intended to apply the Plan at Malibu High School. The Plan and the transmittal memo were inadequate in meeting the TSCA requirements for a cleanup plan to address caulk containing PCBs greater than 50 ppm at MHS. In our comments we requested the District submit a Malibu High School specific plan that meets the requirements of TSCA, including the required certifications under 40 CFR 761.61(a).
- Our comment letter also recommended that the District move forward with the "Building Material Inspection Plan" and the "PCB Best Management Practices" sections of the Plan after consideration of our comments. These activities do not require EPA approval.
- We requested that the MHS specific plan and District-wide plan be submitted to us by July 4, 2014. We said we will approve the MHS plan and provide comments on the District-wide plan.
- Last week the District submitted a sampling plan and, after comments, we concurred with their approach. The plan is to conduct air and wipe samples prior to and after implementation of the BMP to demonstrate effectiveness of the BMPs. Our concurrence was requested in order to facilitate monitoring and implementation of the BMPs during the current summer break. The District will need to submit a revised sampling plan to address long term monitoring of the caulk known to be above 50 ppm.
- We expect that the MHS specific PCB cleanup plan due July 4, 2014 will include at least (1) a proposed schedule for removal of the caulk greater than 50 ppm; (2) proposed monitoring plan to ensure air and surfaces are protective during the period before removal and immediately after removal of the caulk; (3) proposed surface wipe health based cleanup standards; (4) proposed process for decontamination of substrate in contact with PCB containing caulk, and (5) proposed pilot studies to evaluate frequency of BMPs.

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